



U.S. Department of Justice

United States Attorney  
Southern District of New York

86 Chambers Street, 3<sup>rd</sup> Floor  
New York, New York 10007

June 30, 2022

**BY ECF**

Hon. Victor Marrero, United States District Judge  
United States District Court for the Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, New York 10007-1312

Re: *Jones et al. v. United States Postal Service et al.*, No. 20 Civ. 6516 (VM)

Dear Judge Marrero:

This Office represents the defendants in the above-referenced case. We write jointly on behalf of all parties respectfully to request a further adjournment of the deadline for Plaintiffs to file an application, if they choose to do so, for fees under the Equal Access to Justice Act. The deadline is currently July 1, 2022. (ECF No. 144). The parties seek an adjournment until August 15, 2022, to allow them additional time to discuss the issue of fees. Since the parties' last update to the Court (ECF No. 143), the parties have conferred substantively regarding a potential consensual resolution of this outstanding issue, and have made progress. In the coming days and weeks, the parties intend to continue these discussions, and will also alert the Court if the parties believe that the Court's assistance may be helpful.

The parties thank the Court for its consideration of this joint request.

Respectfully,

DAMIAN WILLIAMS  
United States Attorney for the  
Southern District of New York  
*Attorney for Defendants*

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